

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

BRADEN GROUP B.V. and BRADEN
AMERICAS, INC.

Plaintiffs,

v.

ENERGYLINK INTERNATIONAL INC. and
ENERGYLINK CORPORATION,
Defendants.

C.A. No. 4:23-cv-00630

JURY TRIAL REQUESTED

**PLAINTIFFS' BRADEN GROUP B.V. AND BRADEN AMERICAS, INC.'S
UNOPPOSED MOTION TO SEAL EXHIBITS TO BRADEN'S
FIRST AMENDED COMPLAINT**

Plaintiffs Braden Group B.V. and Braden Americas, Inc. ("Braden") hereby files this Unopposed Motion to Seal Confidential Exhibits to its First Amended Complaint, and respectfully requests permission to file the unredacted version of Exhibits A-2–A-15 and Exhibit K attached to its First Amended Complaint under seal. A brief description of the contents of Exhibits A-2–A-15 and Exhibit K is set forth below:

- Exhibit A-2 is a non-public engineering drawing, No. 10699-CS3400, titled "AIG Piping Arrangement"
- Exhibit A-3 is a non-public engineering drawing, No. 10699-CS3401, titled "AIG Vertical Header Weldment"
- Exhibit A-4 is a non-public engineering drawing, No. 10699-CS3402, titled "Sparger Pipe Weldment"
- Exhibit A-5 is a non-public engineering drawing, No. 10699-CS3403L, titled "Lower Blender Plates Assembly Weldment"
- Exhibit A-6 is a non-public engineering drawing, No. 10699-CS3403R, titled "Upper Blender Plates Assembly Weldment"

- Exhibit A-7 is a non-public engineering drawing, No. 10699-CS3404, titled “Blender Plates Assembly Weldment”
- Exhibit A-8 is a non-public engineering drawing, No. 10699-CS3411, titled “AIG Piping Weldment”
- Exhibit A-9 is a non-public engineering drawing, No. 10699-CS3412, titled “AIG Piping Weldment”
- Exhibit A-10 is a non-public engineering drawing, No. 10699-CS3421, titled “AIG Spool Piping Weldment”
- Exhibit A-11 is a non-public engineering drawing, No. 10699-CS3422, titled “AIG Spool Piping Weldment”
- Exhibit A-12 is a non-public engineering drawing, No. 10699-CS3441, titled “AIG Pipe Sliding Support Weldment”
- Exhibit A-13 is a non-public engineering drawing, No. 10699-CS3442, titled “AIG Pipe Fixed Support Weldment”
- Exhibit A-14 is a non-public engineering drawing, No. 10699-CS3443, titled “AIG Pipe Main Feed Sliding Support Weldment”
- Exhibit A-15 is a non-public engineering drawing, No. 10699-CS3444, titled “AIG Spool Pipe Support Weldment”
- Exhibit K is a non-public document titled, “Purchase and Sale Agreement – Books and Records.”

Counsel for Braden attempted to confer with counsel for Defendants EnergyLink International Inc. and EnergyLink Corporation (“EnergyLink”) regarding the filing of this motion. Counsel for EnergyLink stated its position as follows: “We will not oppose the motion to seal, as long as Braden indicates in the motion that EnergyLink does not agree that the documents at issue should be sealed.”

Exhibits A-2–A-15 and Exhibit K to the Amended Complaint each contain confidential material. Braden believes it would be harmful if this information were revealed to the public

and/or Braden's competitors. As such, good cause exists to permit Braden to files these Exhibits under seal.

Braden respectfully requests this Court grant permission to file Exhibits A-2–A-15 and Exhibit K to its First Amended Complaint under seal, and further requests that the Court maintain these documents under seal.

Dated: April 5, 2023

Respectfully submitted,

FISH & RICHARDSON P.C.

By: /s/ Kevin Su

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CERTIFICATE OF CONFERENCE

Counsel for Braden attempted to confer with counsel for EnergyLink on April 4 and 5, 2023 regarding the relief requested in this motion, and EnergyLink agreed that it is not opposed to the relief requested herein.

/s/ Kevin Su

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on April 5, 2023 to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system per Local Rule CV-5.1.

/s/ Kevin Su